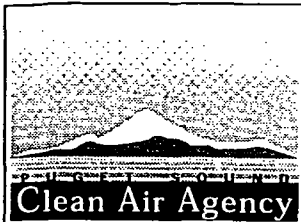


12/03/04



Puget Sound Clean Air Agency

Written Warning

110 Union Street, Suite 500
Seattle, WA 98101-2038
Ph: 206.343.8800 / 1.800.552.3565
Fax: 206.343.7522
www.pscleanair.org

USEPA SF



1259940

Inspection Date: 12/3/04

No 2-000342 ccl 1.7.05

Time: 9:50 Am

Case/Registration No. R# 15019	Name Longview Fibre Co.		Responsible Person, Title Eric Perantio maint. Supervisor	
Site Address 5901 E. Marginal Way So.	City Seattle	Zip 98134	County King	
Mailing Address PO Box 24867	City, State Seattle, WA.	Zip 98124-0867	Phone (206) 762-7170	

Regulations Violated: 40 CFR 60 Subpart Dc

Daily usage log for amount of Natural gas or diesel oil burned in Boiler required.

Order of Approval 6264 No. 5 maintain records on-site demonstrating boiler fuel oil < .05% sulfur

Violation Description: Reg. I 5.05(c) develop & implement O&M log for Corn Starch Baghouse

During my compliance inspection of your facility on 12/3/04, I observed no daily fuel usage log for the boiler. I also observed no fuel oil data sheet from the supplier to demonstrate fuel oil w/ sulfur less than .05%.

③ The baghouse O&M logs showed only a check to make sure the bags were attached. Develop O&M log to document pressure drop, bag condition, bag changes, check for visible emissions. If you do not take the corrective action described below to comply with the regulations of the Puget Sound Clean Air Agency, the Agency may issue a Notice of Violation that may result in a civil penalty for fallout.

☒ By within 10 days, submit a written report describing the action you have taken to correct this violation and achieve compliance with agency regulations.

☐ By _____, you must:

Issued By:

Received By:

Signing this is not an admission of guilt

Date/Time: 12/3/04 10:10 am

Routing Record

To: Initials/Date:

1. Supervisor	MAM 1/3/05
2. Linda/Valerie	WJA 1-7-05
3. Other	/
4. Central Files	/
5.	/

PUGET SOUND CLEAN AIR AGENCY

110 Union Street, Suite 500
Seattle, WA 98101-2038

ROUTINE INSPECTION REPORT

Reg #: 15019

AIRS#:

Personal Protective Equipment Checklist

As determined by PSCAA and Inspector
based on conditions at the Source on the
date of the current inspection:

**MUST BE COMPLETED PRIOR TO
INSPECTION**

Safety Equipment	Required	Optional
None		
HardHat		
Goggles		
Safety Glasses		
Hearing Protection		
Respirator		
Safety Shoes	X	
Rubber Boots		
Leather Gloves		
Chemical Gloves		
Coveralls		
Tyvek		
Safety Vest		
Other		

Assigned Inspector EMG Engineer GSP
Last Inspection Date 12/10/02

Facility: Longview Fibre Co

Street Address: 5901 E Marginal Wy S

City: Seattle

Zip: 98134

Mailing Address: PO Box 24867

City: Seattle

Zip: 98124-0867

Contact Persons: Tom Craig
Tim Lutzko
Belton Rogers

Plant Manager (206) 762-7170
206-762-7171 (206) 762-7170
ext 262 (206) 762-7170

Persons Contacted: Eric Perantie

Maintenance Supervisor 206-762-7171 ext 262

North American Industry Classification System (NAICS):

322211 Corrugated and Solid Fiber Box Manufacturing

40 CFR Parts: 60 Dc

Last Comment: Minor Source Designation Ltr 5/11/95

Type of Inspection:

☐ Offsite Report (Level 1)

☒ Onsite Routine (Level 3, 3, 4)

Last Inspection: 12/10/2002 EMG MM Onsite Routine Observed steam plume from boiler - on roof for presence.
Odor. No odors observed.

Date of Inspection: 12/3/04 8:45 am PSCAA Reps: E. Gilpin

Inspection Summary: Routine Annual Compliance Inspection. No equipment changes. Source not in compliance with NSPS subpart Dc boiler record keeping & reporting requirements. B/H O&M log incomplete. WWA 2-000342 issued. Emission below 15.05(b) reporting levels. Corrective Action packet submitted 12/10/04 addressing all issues on WWA.

Recommendation: Case closure letter, update Equipment List & update contact list

PUGET SOUND CLEAN AIR AGENCY

110 Union Street, Suite 500

Seattle, WA 98101-2038

Facility: Longview Fibre Co

Reg #: 15019

Attachments: _____

Notice of Violation #: _____

Film#: _____

Report By:/Date _____

Inspection Objectives:

See attached inspection report

Exterior Observations (Before Inspection):

no visible emissions or odors observed

Inspections (Last 5)

Type

Comment

NOV

12/10/2002 EMG MM	Onsite Routine	Observed steam plume from boiler - on roof for presence of So. Park Odor. No odors observed.	
7/31/2001 EMG	Onsite Routine	CSR - Info request re: NC 6264 cond # 5. Update equip list.	
10/27/1998 EMG	Onsite Routine	No Equip Changes. Update File. Good boiler O&M, need baghouse O&M.	
8/2/1996 EMG	Onsite Routine	NC 6264.	
9/18/1995 EMG	Onsite Routine	CSR Re 5.05(E)[i]. Update Contact List.	

Notices of Construction/Notifications:

Approved

Inspected

Installed

#824	Cyclone On Shredder	9/29/1972		10/31/1972
#6264	Boiler @ 25 Mmbtu/Hr	12/5/1995	8/2/1996	12/27/1995
Emission Limits; #2 Oil No More Than 0.05% Sulfur				

Notices of Construction/Notifications Special Conditions:

#6264 Boiler @ 25 Mmbtu/Hr

4. Longview Fibre Co. (LFC) is subject to requirements of 40 CFR 60 Subpart Dc and shall notify EPA of the installation.

5. LFC shall operate these boilers using No. 2 oil with no more than 0.05% sulfur. Records shall be

PUGET SOUND CLEAN AIR AGENCY
110 Union Street, Suite 500
Seattle, WA 98101-2038

Facility: Longview Fibre Co

Reg #: 15019

Notices of Construction/Notifications Special Conditions:

maintained for a period of two years and made available to PSAPCA personnel upon request.

6. Within 180 days of startup of the boilers, LFC shall perform a compliance test according to Regulation I, Section 3.07, to demonstrate compliance with the NOx and CO limits in Condition No. 7.

7. The emissions of this boiler shall not exceed any of the following: a. NOx = 0.05, CO = 0.05, SO2 = 0.01, VOC = 0.02 lb/MMBtu one-hour average on natural gas. b. NOx = 0.20, CO = 0.10, SO2 = 0.60, VOC = 0.05 lb/MMBtu one-hour average on No. 2 oil. c. PM-10 = 0.02 gr/dscf @ 7% O2. d. Source test methods are EPA Methods 6C for SO2, 7E for NOx, 10A for CO, and 25A for VOC; and PM-10 by PSAPCA procedure in Resolution 540 dated Aug 11, 1993.

8. It shall be unlawful for LFC to cause or allow the emission of any air contaminant from this boiler which exceeds 10% opacity according to EPA Method 9.

One natural gas/No. 2 oil fired Cleaver-Brooks Boiler rated at 25.1 MMBtu/hr.

Air Contaminant Generating Equipment

Associated Control Equipment:

(1) Boiler

Cleaver Brooks

Rated: ~~25.10000038~~ Lb/Batch

Natural Gas/ Dist (#2 Oil or PS-300)

25 mmbtu/hr

NC/NOT#: 6264

(2) Storage Bin/Silo System

NE Exterior Corn Starch Silo

Rated: 55000 Lb

CE(2) Baghouse

On Top Of Silo 50 Bags

Rate 500 ACFm

* (3) Paper Shredder

/baler

* CE(1) Single cyclone

Paper Shredder And Presses

Year Installed: 1972

42000 CFM

NC/NOT#: 824

Puget Sound Clean Air Agency

110 Union Street, Suite 500, Seattle, WA 98101-2038: Gerry Pade (206) 689-4065

**Point Source Emission Report
October 15, 2004**

LONGVIEW FIBRE CO

**Facility ID #: 15019
AFS#:**

Facility Emission Summary



Puget Sound Clean Air Agency

110 Union Street, Suite 500, Seattle, WA 98101-2038: Gerry Pade (206) 689-4065

Point Source Emission Report

October 15, 2004

LONGVIEW FIBRE CO

5901 E Marginal Wy S

Seattle, WA 98134

Facility ID #: **15019**

AFS#:

Emission Point/Segment Summary

Point 001 External Combustion Boilers

Segment 01 Natural Gas Boilers - 14.7 Mmbtu/Hr

Segment 02 Diesel Oil

Puget Sound Clean Air Agency

110 Union Street, Suite 500, Seattle, WA 98101-2038: Gerry Pade (206) 689-4065

Point Source Emission Report October 15, 2004

LONGVIEW FIBRE CO

Facility ID #: **15019**
AFS#:

Emission Point/Segment Detail

Point 001 External Combustion Boilers

Segment 01 Natural Gas Boilers - 14.7 Mmbtu/Hr

Source Classification Code (SCC): **1-02-006-02** Reference Units: **Million Cubic Feet of Natural Gas Burned**

SCC Desc 1: **External Combustion Boilers**

SCC Desc 3: **Industrial**

SCC Desc 6: **Natural Gas**

SCC Desc 8: **10-100 Million Btu/hr**

<u>Year</u>	<u>Process Quantity</u>	<u>Process Units Used</u>
2002	_____	1000 Therms
2003	_____	1000 Therms

<u>CAS#</u>	<u>Flags</u>	<u>Air Contaminants:</u>	<u>pounds/2002</u>	<u>pounds/2003</u>	<u>Method</u>
_____	---	_____	_____	_____	_____
_____	---	_____	_____	_____	_____

CAS# _____ Chemical Abstract Services Number _____
Method Code: 1 Emission Test 2 Material Balance 3 EPA Emission Factor 4 Engineering Judgment

Point Source Emission Report
October 15, 2004

LONGVIEW FIBRE CO

Facility ID #: **15019**
AFS#:

Emission Point/Segment Detail

Point 001 External Combustion Boilers

Segment 02 Diesel Oil

Source Classification Code (SCC): **1-02-005-01** Reference Units: **1000 Gallons of Distillate Oil (No. 1 & 2) Burned**

SCC Desc 1: **External Combustion Boilers**

SCC Desc 3: **Industrial**

SCC Desc 6: **Distillate Oil**

SCC Desc 8: **Grades 1 and 2 Oil**

<u>Year</u>	<u>Process Quantity</u>	<u>Process Units Used</u>
2002	_____	1000 Gal
2003	_____	1000 Gal

<u>CAS#</u>	<u>Flags</u>	<u>Air Contaminants:</u>	<u>pounds/2002</u>	<u>pounds/2003</u>	<u>Method</u>
_____	---	_____	_____	_____	_____
_____	---	_____	_____	_____	_____

CAS# _____ Chemical Abstract Services Number _____
Method Code: 1 Emission Test 2 Material Balance 3 EPA Emission Factor 4 Engineering Judgment

* This item does not require a Notice of Construction.

Longview Fibre Company R# 15019
5901 E. Marginal Way So.
Seattle, WA. 98134

12/03/04 8:45 AM

I arrived on-site wearing my Agency ID and contacted Eric Perantie, Maintenance General Supervisor for Longview Fibre. I explained the inspection objectives to him:

- Inspect for compliance
- Discuss the processes at the facility
- Review the operations and maintenance logs
- Review the boiler fuel oil data sheet, record keeping and reporting requirements under the NSPS subpart Dc

Operations

The source manufactures corrugated boxes from paper. The source also prints designs on the boxes using low voc ink (< .5 lb/gallons containing no HAPS). Longview applies the inks in one of six flexographic printing presses. The Longview Washington Pulp and Paper mill provides large rolls of brown paper to the source. The source operates two 8-hr. shifts per day. The source shreds trim from the corrugated line, as well as bad product. The cyclone collects the pieces; they are compressed into large bales and sent to Japan by container ships. The cyclone is not a pollution control device and there is no particulate that collects in a hopper.

NSPS Subpart Dc Boiler

I inspected the boiler. It was on-line. The boiler provides heat for the large pressure vessels that create the corrugated cardboard. The boiler burn rate varies from 10% to 80% as measured by an electronic meter. I reviewed the boiler O&M log and I observed that the source was conducting daily maintenance on the boiler and documenting stack gas temperature, steam pressure, fuel supply pressure, low water cutoff, boiler blowdown, and water chemical treatment. An outside firm audits Longview's boiler water chemistry once per month. Cole Industries conducts a tune up on the boiler on a yearly basis. Longview has not burned diesel oil in the boiler in the past two years. They burn diesel oil in the boiler only during periods of curtailment.

The fuel data sheet for the boiler oil Chevron HS Diesel 2 indicates the sulfur content of the oil is between 0 and 0.5% by weight. The Federal NSPS limits the sulfur content in the oil to 0.5% by weight. However, the order of approval No. 6264 limits the sulfur content in the oil to 0.05%. It is unclear if the source is in compliance with the 0.05% sulfur content limit for the oil in the permit. I left a voice mail message with engineer, Fred Austin regarding this matter on 12/16/04. There were no daily fuel use logs (oil and natural gas) for fuel burned in the boiler on-site. In addition the source was unaware of the federal rule requirement to submit semi-annual reports to



12/16/04


the agency with the amount of oil burned in the boiler and the days on which it was burned during the semi-annual period.

Cyclone and Baghouse on Roof

I inspected the cyclone and the cornstarch silo baghouse on the roof. There were no visible emissions coming from the cyclone. However, there was a substantial accumulation of large pieces of paper under the cyclone due to a plug the night before. Mr. Peranti explained that a crew would clean up the material today to prevent fallout. There were no visible emissions coming from the baghouse. The silo baghouse was not in a location where I could read the pressure gauge. Every month. The baghouse operates only when the corn starch silo is being filled. The source receives cornstarch deliveries once per week. I reviewed the baghouse O&M log. The source was monitoring only whether or not the bags were attached. I requested that Mr. Peranti check and record in the O&M log the following parameters during baghouse inspections; pressure drop reading, stack visible emissions, fallout, bag condition, and bag changes. Mr. Peranti submitted an updated baghouse log sheet on 12/10/04. The updated log sheet contained these parameters.

Closing Conference

We returned to the office. I issued WW No. 2-000342. I discussed the applicable regulations with Mr. Peranti including Reg. I 5.05(b) demonstrate emissions are below reporting thresholds, Reg. I 9.20, 9.15, and the boiler NSPS. I left a boiler NSPS handout with Mr. Peranti. On 12/16/04, I prepared a case closure letter based on the corrective action response packet dated 12/10/04 demonstrating that Longview had addressed all of the items in the written warning.

 12/16/04